

Wright & Reihner, P.C.

By: Joseph T. Wright, Jr., Esquire
I.D. No. 32690
Danielle M. Mulcahey, Esquire
I.D. No. 76999
148 Adams Avenue
Scranton, Pennsylvania 18503
(570) 961-1166 Telephone
(570) 961-1199 Facsimile

Attorneys for Defendant

**Kirkpatrick & Lockhart
Preston Gates Ellis LLP**

By: David R. Fine, Esquire
17 North Second Street, 18th Floor
Harrisburg, PA 17101
(717) 231-4500 Telephone
(717) 231-4501 Facsimile
By: Kenneth Komoroski, Esquire
Henry W. Oliver Bldg., 535 Smithfield St.
Pittsburgh, PA 15222-2312
(412) 355-6500 Telephone
(412) 355-6501 Facsimile

GREGORY HELLMUTH and
KAREN HELLMUTH, his wife,

Plaintiffs

v.

CABOT OIL & GAS
CORPORATION,

Defendant.

: IN THE UNITED STATES DISTRICT
: COURT FOR THE MIDDLE
: DISTRICT OF PENNSYLVANIA

:
: CIVIL ACTION – LAW
: JURY TRIAL DEMANDED

:
: NO. 3:08-cv-

:
: FILED VIA ECF

NOTICE OF REMOVAL

Defendant, Cabot Oil & Gas Corporation (hereinafter “Cabot”), by and through its undersigned counsel, hereby petitions for the removal of the

action described hereinafter to the United States District Court for the Middle District of Pennsylvania pursuant to 28 U.S.C. § 1441, and in support thereof states as follows:

1. Plaintiffs, Gregory Hellmuth and Karen L. Hellmuth, his wife, filed a Complaint, Docketed at 2008-547, in the Court of Common Pleas of Susquehanna County on April 17, 2008. Cabot first received a copy of the Complaint on April 21, 2008. A copy of the Complaint is attached hereto as Exhibit A.

2. Susquehanna County is located in the Middle District of Pennsylvania; therefore, removal to the United States District Court for the Middle District of Pennsylvania is appropriate.

3. Both currently and at the time the Complaint was filed, Plaintiffs were citizens of the Commonwealth of Pennsylvania in that their permanent residence is located in Pennsylvania.

4. Both currently and at the time the Complaint was filed, Defendant Cabot Oil & Gas Corporation, was a citizen of the State of Texas and the state of Delaware, in that it was incorporated under the laws of the State of Delaware and its principal place of business is located in the state of Texas.

5. Plaintiffs' Complaint alleges causes of action for fraudulent inducement and declaratory judgment.

6. The amount in controversy in this action exceeds the federal jurisdictional limit of \$75,000, exclusive of interests and costs. See Affidavit of Jeffrey L. Keim, Regional Land Manager of Defendant, attached hereto as Exhibit B.

7. The United States District Court for the Middle District of Pennsylvania has diversity jurisdiction over the removed action pursuant to 28 U.S.C. Section 1332 there is complete diversity between Plaintiffs and Defendant¹ and the amount in controversy exceeds \$75,000. Therefore, the Complaint could have been filed in the United States District Court for the Middle District of Pennsylvania.

WHEREFORE, Defendant, Cabot Oil & Gas Corporation, requests that the above action now pending in the Court of Common Pleas of Susquehanna County be removed therefrom to the United States District Court for the Middle District of Pennsylvania.

¹ Defendant notes that Plaintiffs claim that the Defendant's principal place of business is located in West Virginia. This is not accurate as Defendant's principal place of business is in Texas; however, even if Plaintiffs' claim was true, there would still be complete diversity among the parties.

Respectfully submitted,

WRIGHT & REIHNER, P.C.

BY: /s / Joseph T. Wright, Jr.
Joseph T. Wright, Jr.
Danielle M. Mulcahey
148 Adams Avenue
Scranton, PA 18503
(570) 961-1166
(570) 961-1199 (facsimile)

KIRKPATRICK & LOCKHART
PRESTON GATES ELLIS LLP
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(412) 355-6501 (facsimile)

Attorneys for Defendant,
Cabot Oil & Gas Corporation

Dated: May 5, 2008

CERTIFICATE OF SERVICE

I hereby certify that I forwarded a true and correct copy of Defendant's Notice of Removal by First Class United States Mail, postage prepaid, this date shown below:

Michael J. Giangrieco, Esq.
Law Office of Michael J. Giangrieco
26 Public Avenue
PO Box 126
Montrose, PA 18801-0126

/s / Joseph T. Wright, Jr.

Dated: May 5, 2008